

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re Petition of FRESCATI SHIPPING)	CIVIL ACTION No. 05-305 (JPF)
COMPANY, LTD., as Owner of the M/T)	
ATHOS I and TSAKOS SHIPPING &)	
TRADING, S.A., as Manager of the M/T)	
ATHOS I, for Exoneration from or)	CONSOLIDATED
Limitation of Liability)	
)	
UNITED STATES OF AMERICA,)	CIVIL ACTION No. 08-2898 (JPF)
Plaintiff,)	
v.)	
CITGO ASPHALT REFINING)	
COMPANY, et al.)	
Defendants.)	
)	

MOTION TO WITHDRAW COUNSEL OF RECORD

NOW INTO COURT, through undersigned lead counsel, comes CITGO Asphalt Refining Company, CITGO Petroleum Corporation, and CITGO East Coast Corporation (hereinafter collectively “CARCO”)—claimants, counter-defendants, and defendants in these consolidated cases— who respectfully moves this court to withdraw as counsel of record from the Chaffe McCall Law Firm, Daniel A. Tadros, Ivan M. Rodriguez, John L. Robert, III, Jonathan C. McCall, Robert B. Fisher, Jr. and Thomas D. Forbes.

WHEREFORE, CITGO, respectfully requests that this Honorable Court enter an Order granting this Motion and allow Daniel A. Tadros, Ivan M. Rodriguez, John L. Robert, III,

Jonathan C. McCall, Robert B. Fisher, Jr. and Thomas D. Forbes to withdraw as counsel of record in this matter.

Respectfully submitted,

/s/ Derek A. Walker

Derek A. Walker, T. A.,
CHAFFE McCALL, L.L.P.
2300 Energy Centre
1100 Poydras Street
New Orleans, Louisiana 70163-2300
Telephone: (504) 585-7000
**Attorneys for Claimant,
CITGO Asphalt Refining Company,
CITGO Petroleum Corporation, and
CITGO East Coast Corporation**

Certificate of Service

I hereby certify that I have on this 30th day of August, 2013, served a copy of the foregoing pleading on counsel for all parties to this proceeding, by either hand delivery, facsimile, email, ECF filing, or by depositing the same in the United States mail, properly addressed, and first-class postage prepaid.

/s/ Derek A. Walker